

EXHIBIT 4



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February 15, 2012

VIA E-MAIL and U.S. FIRST CLASS MAIL

Joshua Smith, Esq.
Smith LLC
2910 Voelkel Avenue, Suite 1
Pittsburgh, PA 15216-2079

**Re: Debra L. Harris v. Crown Castle International Corporation
Civil Action No. 2:11-cv-01302 (RCM) (U.S.D.C. – W.D. Pa.)**

Dear Mr. Smith:

This letter is intended to follow up regarding the issues raised in my February 10, 2012 letter. Specifically, it is designed to satisfy the requirement of Federal Rule of Civil Procedure 37(a)(1) to confer prior to seeking Court intervention.

As my February 10, 2012 letter indicates, Plaintiff's Responses to Defendant's First Request for Production of Documents are needed for Plaintiff's February 24 deposition. However, Plaintiff's Responses to Defendant's First Request for Production of Documents are overdue and there has been no request for an extension of time.

Similarly, Defendant served its Initial Disclosures by the due date. Defendant has not received Plaintiff's Initial Disclosures or any request for additional time. This also is needed for the deposition.

Please immediately contact me to discuss the above issues in order that a motion to compel may be avoided. Thank you.

Sincerely,

COHEN & GRIGSBY, P.C.

By: 
Robert F. Prorok

RFP:csf

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